

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MRI SOFTWARE, LLC,)	CASE NO. 1:12-cv-01082-CAB
)	
Plaintiff,)	JUDGE Christopher A. Boyko
)	
v.)	
)	MAG. JUDGE: Nancy A. Vecchiarelli
LYNX SYSTEMS, INC.,)	
)	
DONALD ROBINSON,)	
)	
Defendants.		

JOINT MOTION TO EXTEND CASE DEADLINES

Plaintiff MRI Software, LLC and Defendants Lynx Systems, Inc. and Donald Robinson hereby jointly move the Court to extend the deadlines set forth in the Court's July 20, 2015 Order, which states as follows:

Fact Discovery due by 8/24/2015. Expert Report due by 9/25/2015, with Response Report by 10/30/2015 and Reply Report by 11/20/2015. Expert Discovery due by 12/18/2015. Dispositive Motions due by 2/1/2016.

Fact discovery has been substantially completed. In light of fact discovery, the parties believe that they may be able to reach agreement as to the resolution of some of the 17 pending claims and 13 pending counterclaims, narrowing the issues for expert reports and summary judgment. To allow the parties time to complete these discussions, the parties respectfully request that the Court briefly extend the expert discovery and summary judgment deadlines, setting the following schedule for completion of expert discovery and dispositive motion practice:

Expert Report by Party with Burden of Proof:	October 31, 2015
Response Expert Reports:	December 4, 2015
Reply Expert Reports:	December 21, 2015

Expert Discovery Complete:

January 29, 2016

Dispositive Motion Deadline

March 18, 2016

This joint motion is not brought or meant for purposes of delay, but to potentially narrow the issues in the case and conserve the resources of the parties and the Court.

September 24, 2015

Respectfully submitted,

/s/Georgia K.E. Yanchar

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CERTIFICATE OF SERVICE

I hereby certify that, on September 24, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.

/s/ Georgia K.E. Yanchar
Attorney for MRI Software, LLC